

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW PURSE,

Defendant.

CASE NO. 1:21-CR-00512-PLF

Honorable Paul L. Friedman
United States District Judge

**DECLARATION OF HILARY POTASHNER IN SUPPORT OF MATTHEW PURSE’S
MOTION FOR BOND MODIFICATION**

Dated: November 6, 2024

Respectfully submitted,

LARSON LLP

By: /s/ Hilary Potashner

Stephen G. Larson (Bar 1046780)

Hilary Potashner (Admitted *pro hac vice*)

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Attorneys for Defendant Matthew Purse

DECLARATION OF HILARY POTASHNER

I, Hilary Potashner, declare as follows:

1. I am a partner with Larson LLP, attorneys of record for defendant Matthew Purse. I make this declaration in support of Mr. Purse's Motion for Bond Modification.

2. On October 31, 2024, I spoke with U.S. Probation Officer Christopher "Joey" Trabucco, who currently provides courtesy supervision of Mr. Purse in the Central District of California. I informed him of Mr. Purse's request to modify the conditions of his release. Officer Trabucco advised that he does not oppose Mr. Purse's courtesy supervision being transferred to the District of Idaho and does not oppose the removal of location monitoring as a condition of Mr. Purse's pretrial release. He noted, however, that he defers to the judgment of Pretrial Officer John Copes of the Pretrial Services Agency for the District of Columbia.

3. I also spoke with Officer Copes of the District of Columbia on October 31, 2024. Officer Copes advised me that he does not oppose Mr. Purse's courtesy supervision being transferred to the District of Idaho and does not oppose the removal of the location monitoring condition as a condition of Mr. Purse's pretrial release.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 6th day of November, 2024, at Los Angeles, California.

/s/ Hilary Potashner
Hilary Potashner